

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SHARON ORTIZ ALAMO

DEBTOR

CASE NO. 21-01666/MCF

CHAPTER 13

**DEBTOR'S REPLY TO *MOTION TO DISMISS*, DOCKET NO. 59  
AND IN COMPLIANCE WITH *ORDER*, DOCKET NO. 64.**

**TO THE HONORABLE COURT:**

**COMES NOW, SHARON ORTIZ ALAMO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 59, whereby the Trustee requests the Court to dismiss the present Chapter 13 case based on Plan arrears incurred by the Debtor, in the sum of \$1,155.00, in the above captioned case.
2. On June 7, 2022, this Honorable Court issued an *ORDER*, Docket No. 64, whereby the Debtor is Ordered to reply within 21 days to the *Trustee's Motion to Dismiss* (Docket No. 59), which Order became due by November 23, 2022.
3. The Debtor hereby respectfully informs the Court that on November 23, 2022, she made one (1) \$529.00 payment, money order number 19-0374847521, to cure the balance in the arrears in the confirmed Plan. Attached is copy of the payment made to the Trustee, as evidence of having cured arrears.
4. The Debtor respectfully submits that she is up-to-date in the confirmed Plan payments, thus, respectfully requests the Court to take note of said Plan payment made and deny the *Trustee's Motion to Dismiss*, Docket No. 59, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing Reply to the *Trustee's Motion to Dismiss*, Docket No. 59, and in compliance with *Order* dated November 7, 2022, Docket No. 64, in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 28<sup>th</sup> day of November, 2022.

**/s/Roberto Figueroa Carrasquillo**  
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THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT NO MORE

MONEY  
ORDER

19-374847521

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\$ 529.00

**PAY EXACTLY**

PAY TO THE  
ORDER OF

ONE HUNDRED TWENTY-NINE DOLLARS AND NO CENTS

Josi R. Cannon

21-06064C-13

PO Box 88109 Chicago IL 60680-1109

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